

# Cole Schotz P.C.

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November 8, 2018

## Via Electronic Case Filing

Honorable James B. Clark III  
United States Magistrate Judge  
United States Post Office & Courthouse  
5 Federal Square  
Newark, New Jersey 07010

Re: Hantman, et al. v. Naar, et al.  
Case No.: 2:18-cv-11047-KM-JBC  
Motion to be Relieved as Counsel

Dear Judge Clark:

This firm represents defendants Garth Andre Naar and Avatar Management, LLC (collectively, the “Avatar Parties”). We write to request rescheduling of the in-person conference scheduled for December 6, 2018 on the motion (the “Motion”) of Cole Schotz P.C. (“Cole Schotz”) to be relieved as counsel for the Avatar Parties. [Dkt. 74.] The Motion was filed pursuant to Judge McNulty’s text order directing Cole Schotz to file the Motion by November 2, with opposition (if any) to be filed by November 9, and any reply by November 14. [Dkt. 70.] The Motion was filed on November 2 [Dkt. 72], along with a declaration filed under seal.

Unfortunately, I have a conflict in my schedule on December 6. I will be California for an arbitration that has been scheduled for several months. The arbitration hearing is scheduled for December 4, 5, and 6 with JAMS in San Jose, California. I have consulted with all counsel in this matter and they have provided the courtesy of consent to reschedule the in-person conference. I also have the consent of the Avatar Parties. All counsel and the Avatar Parties are available on November 26 or December 10 for the in-person conference. We hope the Court can accommodate the parties and counsel on one of these dates.

Cole, Schotz, Meisel, Forman & Leonard, P.A.  
Attorneys at law

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We thank the Court for its consideration.

Respectfully submitted,

*/s/ Edward Sun Kiel*

Edward Sun Kiel

ESK:dmh

cc: All counsel (*via ECF*)  
Garth Andre Naar (*via email*)  
Avatar Management, LLC (*via email*)